

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

NATIONAL RAILROAD PASSENGER  
CORPORATION,

Plaintiff,

v.

ARCH SPECIALTY INSURANCE COMPANY;  
ASPEN SPECIALTY INSURANCE COMPANY;  
COMMONWEALTH INSURANCE COMPANY;  
FEDERAL INSURANCE COMPANY; LEXINGTON  
INSURANCE COMPANY; LIBERTY MUTUAL FIRE  
INSURANCE COMPANY; CERTAIN  
UNDERWRITERS AT LLOYD’S OF LONDON and  
CERTAIN LONDON MARKET COMPANIES  
Subscribing to Policy Nos. 507/N11NA08240,  
507/N11NA08241, 507/N11NA08242,  
507/N11NA08244, 507/N11NA08244,  
507/N11NA08245 and GEP 2944; MAIDEN  
SPECIALTY INSURANCE COMPANY; MAXUM  
INDEMNITY COMPANY; NAVIGATORS  
INSURANCE COMPANY; PARTNER  
REINSURANCE EUROPE plc; RSUI INDEMNITY  
COMPANY; SCOR GLOBAL P&C SE; STEADFAST  
INSURANCE COMPANY; TORUS SPECIALTY  
INSURANCE COMPANY; and WESTPORT  
INSURANCE CORPORATION,

Defendants.

14 Civ. 7510 (JSR)

**STATEMENT OF DEFENDANTS CERTAIN UNDERWRITERS AT LLOYD’S OF  
LONDON & CERTAIN LONDON MARKET INSURANCE COMPANIES UNDER  
FED. R. CIV. P. 7.1**

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, (i) certain underwriters at  
Lloyd’s of London associated as syndicates 4472, 1206, 2003, 2001 and 510 in the London  
insurance market severally subscribing first-party property insurance contracts Policy Nos.  
N11NA08242, N11NA08244 and GEP 2944 at issue in this action (collectively “Lloyd’s

Underwriters”), and (ii) Sirius International Insurance Corporation and Houston Casualty Company subscribing to Policy No. N11NA08244 (collectively, the “Market Companies”), non-governmental corporate parties, certify the following:

1. **Policy No. N11NA08242.** The entities known as agreement parties for this contract are:
  - a. Certain Underwriters at Lloyd’s comprising syndicate 4472, managed by Liberty Managing Agency Ltd., a member of the Liberty Mutual Group of companies. Liberty Corporate Capital Limited is the sole capital provider of syndicate 4472, a wholly-owned subsidiary of Liberty International Holdings Inc, which is a member of the Liberty Mutual Group of companies. Liberty Mutual Holding Company Inc is the ultimate parent holding company for the Liberty Mutual Group of companies . No publicly held company owns 10% or more of its stock.
  - b. Certain Underwriters at Lloyd’s comprising syndicate 1206, managed by AmTrust Underwriting Ltd., for which the parent company is AmTrust Financial Services Inc., shares in which are publicly traded on the NASDAQ.
2. **Policy No. N11NA08244 (Lloyd’s).** The entities known as agreement parties for this contract are:
  - a. Catlin Underwriting Agencies Ltd. and all the members of syndicate 2003 at Lloyd’s of London for the 2011 year of account are private companies whose ultimate parent in all cases is Catlin Group Limited. Catlin Group Limited is a Bermuda company listed on the London Stock Exchange.

- b. Certain Underwriters at Lloyd's comprising syndicate 2001 has as its sole underwriting member Amlin Corporate Member Limited, which is managed by Amlin Underwriting Limited. Both Amlin Corporate Member Limited and Amlin Underwriting Limited are organized under the laws of England and Wales, and are ultimately wholly-owned by Amlin plc, a company incorporated in accordance with the laws of England and Wales and listed on the London Stock Exchange.
3. **Policy No. N11NA08244 (Companies):** This contract is subscribed by (i) Sirius International Insurance Corporation, with ultimate parent White Mountains Insurance Group, Ltd., shares in which are publicly-traded on the New York Stock Exchange; and (ii) Houston Casualty Company, owned by HCC International Insurance Company PLC, a subsidiary of HCC Insurance Holdings, Inc., shares of which are publicly-traded on the New York Stock Exchange.
4. **Policy No. GEP2944:** This contract is 100% subscribed by Certain Underwriters at Lloyd's comprising syndicate 510, managed by R J Kiln & Co Limited, a subsidiary of Kiln Group Limited. No publicly held company owns 10% or more of its stock.

ROPES & GRAY LLP

/s/ Catherine A. Mondell

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Reinsurance Europe plc, Torus Specialty  
Insurance Company, Westport Insurance  
Corporation, and Certain Underwriters at  
Lloyd's of London and Certain London  
Market Insurance Companies subscribing to  
Policy Nos. GEP 2944, 507/N11NA08242,  
507/N11NA08244 and 507/N11NA08244*

DATED:       October 31, 2014